# United States Department of the Interior

## BUREAU OF LAND MANAGEMENT Montana State Office

5001 Southgate Drive, P.O. Box 36800 Billings, Montana 59107-6800

http://www.mt.blm.gov/

2800 (924.5) P

In Reply To:

June 8, 2004

EMAIL TRANSMISSION - 6/8/04

Instruction Memorandum No. MT-2004-067, Change 1

Expires: 9/30/05

To: Field Managers

From: Deputy State Director, Division of Resources

Subject: Vegetation Management Practices on BLM-Administered Electrical

Distribution and Transmission Line Rights-of-Way (ROW)

This is to provide clarification to the original IM and "Notice," and to provide a letter template that can be used to send to the utility companies to accompany the enclosed revised "Notice." Field offices are encouraged to work cooperatively with the ROW holders to address vegetation management needs along the ROWs.

The critical issue is distance from the wire to vegetation that might cause "flashing." The issuance of this "Notice" is not intended to have ROWs totally cleared of vegetation. In correcting the situation, we do not want to create excess fuels along the ROW in the form of solid brush stands, nor do we want to create a clear-cut or visual eyesore. Removal of all vegetation along a ROW not only creates visual resource management problems, but can adversely affect the distribution of wildlife species along and adjacent to the electrical distribution and transmission lines.

We want to work cooperatively with ROW holders in developing and implementing vegetative management practices on the ROW areas to ensure not only fire safety, but also to accomplish visual and wildlife habitat management objectives on the public lands.

In some cases, ROW authorizations may contain specific stipulations addressing tree trimming and brush control. However, our objective is to keep in mind that electrical distribution and transmission line clearing should take into account habitat linkage across the ROW, escape cover, and visual concerns. Leaving taller vegetation in the draws and low points along power line ROWs can break up the continuous ribbon of the power line and provide crossing areas for birds and mammals. Reducing the fuels or vegetation in a mosaic pattern also provides escape cover and migration habitat especially for the smaller species. These treatments are often less costly for the utility company since the entire ROW area would not need to be treated.

As instructed in the original IM, field offices are encouraged to conduct routine ROW compliance inspections to ensure that vegetative management stipulations identified in grants are being implemented and that reasonable fire prevention actions are being taken. However, we also need to work with the ROW holders to ensure vegetative management practices also take into consideration our management objectives for visual and wildlife species.

Please direct any questions to Craig Haynes at 406-896-5040, or Gayle Sitter at 406-896-5024.

Signed by: Howard A. Lemm, DSD, Division of Resources

Authenticated by: Kathy Iszler, Staff Assistant (MT-924)

### 1 Attachment

1-Letter Template w/Revised "Notice"

Distribution: w/Attm.

Assistant Field Manager, Havre - 1 Assistant Field Manager, Glasgow - 1

SOMT - 1

### OFFICE LETTERHEAD

Dear Right-of-Way Holder:

The enclosed "Notice" is issued as a reminder that, in anticipation of an intense fire season this year, utility companies in cooperation with BLM should check electric distribution and transmission line ROWs for vegetative growth and needs for possible vegetative management practices. The critical issue is the distance from the wire to vegetation that might cause "flashing." The issuance of this "Notice" is not intended to have ROWs totally cleared of vegetation. In correcting the situation, we do not want to create excess fuels along the ROW in the form of solid brush stands, nor do we want to create a clear-cut or visual eyesore. Removal of all vegetation along a ROW not only creates visual resource management problems, but can affect the distribution of wildlife species along, and adjacent to, the electrical distribution and transmission lines.

We want to work cooperatively with you in developing and implementing vegetative management practices on the ROWs to ensure not only fire safety, but also to accomplish visual and wildlife habitat management objectives on the public lands.

In some cases, ROW authorizations may contain specific stipulations addressing tree trimming and brush control. However, our objective is to keep in mind that power line clearing should take into account habitat linkage across the ROW, escape cover, and visual concerns. Leaving taller vegetation in the draws and low points along power line ROWs can break up the continuous ribbon of the power line and provide crossing areas for birds and mammals. Reducing the fuels or vegetation in a mosaic pattern also provides escape cover and migration habitat especially for the smaller species. These treatments are often less costly for the utility company since the entire ROW area would not need to be treated.

Thank you	for	your	cooperation	in	addressing this concern.	Please	direct
questions	to		NAME ,	at	(phone number).		

Sincerely,

Field Manager

1 Enclosure 1-Notice

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In Reply To:

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**NOTICE** 

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<u>Vegetation Management Practices on BLM-Administered</u> Electrical Distribution and Transmission Line Rights-of-Way (ROW)

In anticipation of an intense fire season this year, the Bureau of Land Management (BLM) is issuing this notice to ROW holders as a reminder to routinely check their BLM-administered ROW areas to monitor the vegetative growth, and to work cooperatively with BLM take appropriate vegetative management action on the ROW area where needed. Some ROW grants contain specific stipulations for tree trimming and brush control that should be adhered to. For ROW grants that do not specifically require vegetative management, the regulations at 43 CFR 2801.2(a)(4) require the holder to do everything reasonably within his or her power, "...to prevent and suppress fires on or in the immediate vicinity of the right-of-way area...." The BLM will be conducting compliance inspections on the ROW areas to ensure compliance with the terms, conditions, and stipulations of the ROW grants. In addressing this, we want to work cooperatively with you to develop and implement vegetative management practices on the ROWs to ensure not only fire safety, but also to accomplish visual and wildlife habitat management objectives on the public land.

A hot, dry summer with a corresponding intense fire season is being forecasted for the western U.S. The critical issue is the distance from the wire to vegetation that might cause "flashing." The recent snow and rain in many portions of the western U.S. may actually exacerbate the fire situation by providing moisture for spring plant growth which will cure off into a very hazardous fire fuel situation. The ROW area may bear the burden of the increased plant growth. Additionally, plant height may be taller than normal because normal ROW vegetative management may have been deferred by ROW holders for various reasons. During hot weather, demand for electricity increases and the combination of increased atmospheric temperatures and increased conductor loads will cause increased "sag" of transmission line conductors. If the sag is greater than normal in an area of taller than normal plant height, there is an increased potential for flash over and a corresponding loss of service (blackout).

Further, August 14, 2003, saw the worst blackout in North American history. Of interest to BLM and industry is that, among the many findings presented in the Final Report of the U.S.-Canada Power System Outage Task Force, released on April 5, 2004, inadequate tree trimming was identified as one of the groups of causes of the blackout.

We appreciate your cooperation and prompt attention to address this concern, especially at a time when an intense fire season is being forecasted in the western U.S. Through actions of ROW holders making routine vegetative management practices in cooperation with BLM on the ROWs, we can go a long way in reducing the threat of a flash over caused blackout and also insure that the visual and wildlife management objectives on the public lands are not adversely impacted.

Please direct any questions to your local BLM Field Office or contact Craig Haynes at the Montana State Office; at telephone number 406-896-5040.

Dated this 8th day of June, 2004

Signed:

/s/ Howard A. Lemm

Howard A. Lemm Deputy State Director, Division of Resources